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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

LINDA NAPPA,

Defendant.

INFORMATION
10 Cr.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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10CRM 068

#### COUNT ONE

The United States Attorney charges:

From in or about January 2007 through in or about September 2007, in the Southern District of New York and elsewhere, LINDA NAPPA, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did make a false statement and representation of fact in a document required by title I of ERISA to be published and kept as part of the records of an employee welfare benefit plan and employee benefit pension plan and certified to the administrator of such plan, and knowingly concealed, covered up, and failed to disclose a fact the disclosure of which was required by such title, and was necessary to verify, explain, clarify and check for accuracy and completeness a report required by such title to be published and information required by such title to be certified, to wit, LINDA NAPPA, as the owner of G&M Installers Inc., submitted false weekly employer remittance reports to the benefit plans of the District Council of the United Brotherhood of Carpenters and Joiners, in which NAPPA intentionally omitted the names and hours

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worked by carpenters to whom she was paying off-the-books wages without benefit contributions.

(Title 18, United States Code, Sections 1027 and 2.)

PREET BHARARA

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

#### UNITED STATES OF AMERICA

- V. -

LINDA NAPPA,

Defendant.

### **INFORMATION**

10 Cr. 711 (SAS)

(Title 18, United States Code, Sections 1027 and 2.)

<u>Preet Bharara</u> United States Attorney.